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Attorneys for Federal Defendants

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

BASE ACCESS, et. al,

Plaintiffs,

v.

NATIONAL PARK SERVICE, et. al,

Defendants.

Case No. 4:25-cv-790

MOTION TO WITHDRAW

Mr. Thomas, who will be leaving the Department of Justice on May 30, 2025, moves to withdraw as counsel of record in this case. Mr. Thomas has informed his clients and opposing counsel of his forthcoming departure. The Federal Defendants will be represented by Mr. Jeffrey Candrian and Mr. Daniel Luecke, who either have or will note their appearance.

Respectfully submitted on May 22, 2025,

ADAM R.F. GUSTAFSON
Acting Assistant Attorney General
Environment and Natural Resources Division

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/s/ J. Scott Thomas

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Attorney for Defendants

CERTIFICATE OF SERVICE

I hereby certify that on May 22, 2025, I electronically filed the **MOTION TO WITHDRAW** with the Clerk of Court using the ECF system, which will automatically send email notification to the attorneys of record.

/s/ J. Scott Thomas

JEFFREY SCOTT THOMAS